Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

September 23, 2002

Southeast Regional Office

610-832-6059
Fax 610-832-6260

Mr. Scott R. Campbell
EarthRes Group, Inc.
P.O. Box 469
Pipersville, PA 18947

Re: Island Green Golf Course Proposed
Groundwater Withdrawal
(former Transit America, Inc., Site,
LRP ID No. 1-51-0-27116)

Dear Mr. Campbell:

Thank you for your letter of June 4, 2002, informing us of the proposed groundwater withdrawal at Island Green Golf course. This well does not require a permit from the Bureau of Water Supply Management because it will not provide water for human consumption. If the status of the well changes to include public supply, then this Bureau must be notified at that time.

If you have any further questions, please call me at 610-832-6055.

Sincerely,

Benjamin B. Greeley

Benjamin B. Greeley, P.G.
Licensed Professional Geologist
Water Supply Management

cc: Mr. Beitler
Re 30 (RN02WSM)266-18

Philadelphia
Water Department

The ARAMARK Tower
1101 Market Street
Philadelphia, Pennsylvania 19107-2994

Kumar Kishinchand, P.E.
Commissioner

July 25, 2002

Mr. Thomas G. Pullar
EarthRes Group, Inc.
P.O. Box 468
Pipersville, PA 18947

Re: Island Green Golf Course
1 Red Lion Road
Philadelphia, PA

Dear Mr. Pullar:

The Water Department has reviewed your June 11, 2002 letter requesting permission to discharge groundwater from the above location to the City's sanitary sewer system. Permission is hereby granted for this discharge which is subject to the City of Philadelphia Wastewater Control Regulations, as well as the following conditions:

- The 72-hour Pump Test will be discharged to an on-site sanitary sewer manhole, which has been approved by the PWD-IWU.
- The on-going discharge will be as described in your letter and will be discharged to an on-site drain.
- Extreme caution must be exercised to ensure the discharge is to the sanitary sewer as discharges to the storm sewer are prohibited.
- BTEX $\leq$ 40 mg/l.
- SGT-HEM (non-polar O&G by EPA method 1664) $\leq$ 100 mg/l.
- Specific emphasis is placed on Arsenic (As) as the WWCR monthly limit is 0.005mg/L, and the submitted analysis was tested with a detection limit of 0.008mg/L.
- No floating layer or visible sheen is present.
- Not to exceed 10% of the lower explosive limit at the point of discharge.
- Exceedances of permitted limits must be reported pursuant to Section 3.3.7 of the City's Wastewater Control Regulations.

- Since Groundwater is used for the backwash a surcharge will apply for BOD>0mg/L and TSS>0mg/L. Since mg/L = ppm = 10^{-6}, the surcharge is calculated in the following matter:

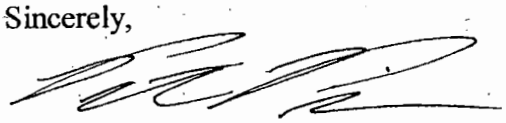
  $(BOD*10^{-6})*(62.4*10^{2}$ lb/ccf)*(GW discharged in ccf)*($/lb)

  $(TSS*10^{-6})*(62.4*10^{2}$ lb/ccf)*(GW discharged in ccf)*($/lb)

  For the period from July 1, 2002 through June 30, 2003 the surcharge rate for BOD and TSS will be $.203/lb. Effective July 1, 2003 and thereafter the surcharge rate for BOD and TSS will be $.214/lb.
- Flow readings and analytical data are provided quarterly to this office along with a check for the surcharge and for the volume of groundwater discharged at the current rate ($4.59/1000 cf as of July 1, 1995).

This permit expires July 31, 2007 or at the end of the project, whichever occurs first. Please feel free to contact me at 215-685-6370, if you have any questions relating to this matter.

Sincerely,



Pete Pineda
Sanitary Engineer
Industrial Waste Unit

30 DAY COPY

Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
July 16, 2002

Southeast Regional Office

610-832-5949
Fax 610-832-6143

(b) (6)
(b) (6)
Willow Grove, PA 19090

Re: ECP – Special Projects – Act 2
Transit America/Island Green CC
LRP ID No. 1-51-0-27116
Red Lion Road
Lower Moreland Township
Montgomery and Philadelphia Counties

Dear (b) (6):

Thank you for your letter of June 30, 2002 addressed to Ms. Dayna Jones. The letter has been referred to the Environmental Cleanup Program, Special Projects Section for response. I will try to respond to your issues regarding the environmental cleanup; however, I am neither in a position to respond to issues you addressed to the Occupational Safety and Health Administration (OSHA), nor to your complaint that you have not received a response from OSHA.

The Pennsylvania Department of Environmental Protection's (PADEP) Environmental Cleanup Program became involved in the remediation of the 214-acre former Transit America, Inc. site in December 1997 when Transit America voluntarily submitted a Notice of Intent to Remediate. This was performed in accordance with the regulations developed pursuant to the Land Recycling and Environmental Remediation Standards Act (Act 2). Groundwater remediation and recovery had been on going prior to this for a number of years. The site was never designated by the Environmental Protection Agency as a Superfund Site, and from what I can tell, was not on the federal Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) list.

The site was first developed for manufacturing during World War II to produce aircraft parts and to assemble military cargo airplanes for the U.S. Government. At the end of the war, the facilities were converted to manufacture passenger railroad cars, and later, automobile chassis. After the cessation of manufacturing in 1987, and with no viable future manufacturing prospects, Transit America began a voluntary assessment of the property to determine current environmental conditions. This comprehensive three-year environmental assessment was completed in late 1989. Voluntary remedial action proceeded at that time under the PADEP oversight. More than 8,000 samples from soil, groundwater, storm water and building structures were collected at the site and analyzed for substances of environmental concern.

The results of the three-year Environmental Assessment indicated that two primary groups of regulated substances were present on the property, Polychlorinated Biphenyls (PCBs) and Volatile Organic Contaminants (VOCs). PCBs were found at the site in surface and subsurface soils and on interior surfaces of some former manufacturing buildings. VOCs were identified in groundwater and below ground disposal areas. The risk assessment completed at that time concluded that human health risks were within EPA's acceptable risk range.

In response to the discovery of these regulated substances, Transit America implemented a series of phased, voluntary environmental remedial actions, such as: 1) a groundwater investigation and remediation program; 2) closure of 14 Underground Storage Tanks (USTs); 3) Operation of a VOC soil vapor extraction system; 4) a surface soil removal program in 22 localized areas which had contained PCBs at levels greater than 1,000 parts per million; and, 5) decontamination of the Main Assembly Building.

Based upon information submitted in the Final Report, the PADEP approved the report for soils, which have been investigated, characterized, and remediated. Volatile organic compounds, semi-volatile organic compounds (SVOCs), polychlorinated biphenyls, pesticides, and inorganic compounds listed in Table I titled "Regulated Substances in Soil Meeting Act 2 Standards," dated June 9, 2000, meet Residential, Non-Residential or Site Specific Standard as set forth in Figure 3 titled "Deed Restricted Areas for Soils; File No. 26216.001 –14" also dated June 9, 2000 and incorporated in the June 2000 Final Report.

The Department approved the Final Report and liability protection per Chapter 5 Section 501 of Act 2 was afforded on August 14, 2000.

We retain all files in our Records Management Section. You or your representative may view these by calling 610-832-6003 to schedule an appointment. The files you may wish to reserve are referred to as: Transit America, One Red Lion Road, ID No. 9514, ECP Act 2 and Tanks Program files. There are twenty-two folders associated with this case. You may also make a reservation by fax to 610-832-6289.

I hope this satisfactorily responds to your inquiry. If you should need additional information, please call the Environmental Cleanup Program at 610-832-5950.

Sincerely,

Robert E. Day-Lewis, P.G.
Chief, Special Projects Section
Licensed Professional Geologist
Environmental Cleanup

cc: Ms. Jones
Mr. Kennedy
File
Re 30 (GJE02)196-6

Ground/Water Treatment & Technology

PO Box 1174 - Denville, NJ 07834
Phone (973) 983 0901 Fax (973) 983 0903

TO: **ERG, INC.**
PO Box 468
Pipersville, PA 18947

Fax: 215-766-1245

Quote Date: **November 1, 2002**
Quotation No.: **177-2075 rev 2**
Bid Date: **November 1, 2002**
Project: **Island Green**
Contact: **Tom Pullar**

QUOTATION

Ground/Water Treatment & Technology (GWTT) is pleased to provide a quotation to ERG, INC. for:

(1) 100gpm groundwater treatment system for removal of VOC's, PCB's and optional Iron; including the following equipment and services:

- (1) Well pump - 100 gpm @ 300' of head Grundfos - Submersible 85S100-9 10hp
- (1) Well pump wire & control station, auto cycle based on demand signal from lagoon
- (1) 5000 lb Carbon Absorber (including 5000lb of reactivated carbon)
- (1) 10'x15' concrete pad for mounting of adsorber tank & optional building
- (1) Lot miscellaneous piping, valves, gauges, flow meter, etc.

- (1) *Optional Greensand Filtration system including:*
  - *Filters, Media and automatic controls*
  - *Chemical mixing, storage & feed system*
  - *2,000 gallon sludge settling/storage tank*
  - *Decant pump, controls and 375lb carbon adsorber*
  - *Prefabricated (filter) building*

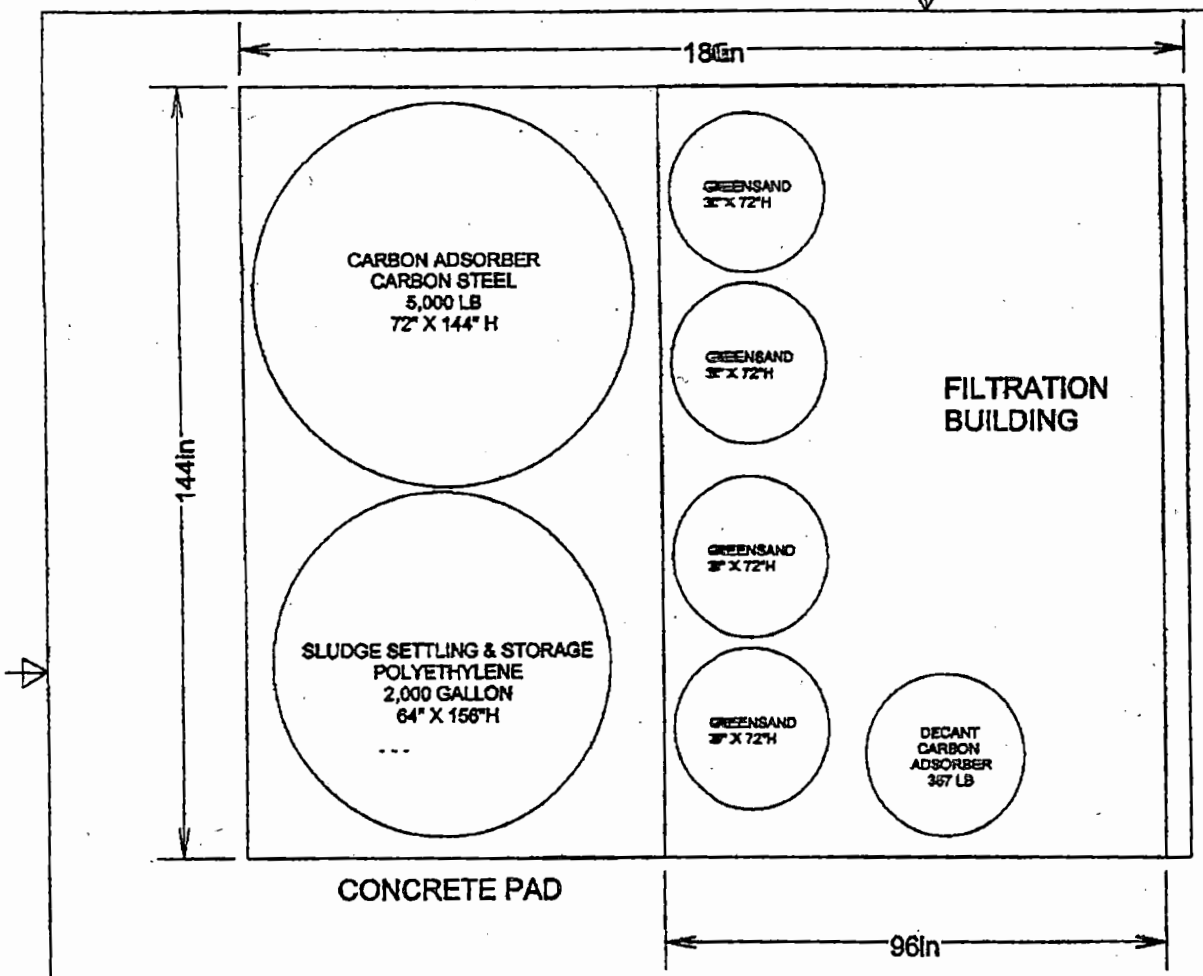
- (1) Lot installation, startup and training service

Note: This proposal does not include:
1) Installation of the submersible pump
2) Vertical piping to submersible pump
3) Installation of electrical service to pump and/or filter building

Total Price:

Adder for greensand filtration:

Payment Terms: Net 30
F.O.B. Shipping Rockaway, NJ
Delivery: 4 to 6 weeks
Estimated installation time: 1 week



GROUND/WATER TREATMENT & TECHNOLOGY, INC.

TITLE: ISLAND GREEN WATER TREATMENT SYSTEM LAYOUT

SIZE	CAGE CODE	DWG NO	REV
A		177-2075	0

SCALE		SHEET
NTS	PJH 11-01-02	1 OF 1

GROUND/WATER TREATMENT & TECHNOLOGY
P.O. BOX 1174, DENVILLE, NJ 07834 800-770-0901

CLIENT: White Pine Partners **SUBJECT:** Groundwater Treatment Plant Design **PROJECT NO.** 021015.001
BY: TGP **DATE:** 11/13/02
PROJECT: Island Green GC **Page** 1 **of** 1

Design Flow:	100 gpm maximum pumping rate (144,000 gpd) 3.0 million gallons per 30 day period
Design Solids Loading:	1 mg/l (0.9 mg/l iron, 0.1 mg/l manganese) 1.2 lbs/day (8.4 lbs/week; 25 lbs/mon @ 3 MGal/mon) (25 lbs/mon) / 8.34 lbs/MGal / 0.01 = 300 gal/mon @ 1%

Greensand Filters:

Dimensions	30" dia x 72" H
Surface Area	4.91 sq. ft. each (19.6 sq. ft. total)
Filtration Rate	100 gpm / 19.6 sq.ft. = 5.1 gpm/sq.ft. (5 gpm/sq.ft. per supplier)
Media Volume	30" dia x 30" depth = 12.3 cu. ft. /filter
Capacity	10,000 gal/cu.ft. @ 1 ppm iron (per supplier) [(10,000 gal/cu.ft.) x 12.3 cu.ft./filter x 4 filters] / 144,000 gpd 3.4 days
Backwash	10 gpm/sq.ft. (minimum per supplier) 4.91 sq.ft.x 10 gpm/sq.ft. = 50 gpm minimum per filter 20 minute cycle (est.)
Backwash Vol.	50 gpm x 20 min. = 1,000 gallons per BW per filter (4,000 gal. total) 4,000 gal / 3 days x 30 days/mon 40,000 gallons/month

Decant Tank:	64" dia x 156" H (2,000 gallons) Provides storage for one backwash (1,000 gallons) plus 3 months of solids storage (900 gallons)

Carbon Adsorber:

Dimensions	72" dia x 144" H
Volume	340 cu. ft. (2,500 gallons)
Capacity	5,000 lbs carbon
Maximum Flow	200 gpm (per manufacturer)
Limiting VOC	cis-1,2 – dichloroethene
Adsorption Rate	2,800 gal/lb carbon (from supplier)
Bed Life	5,000 lbs carbon x 2,800 gal/lb / 3,000,000 gal/mon 4.7 months

Carbon Drum:	To treat water from decant tank generated by filter backwashes prior to discharge
Capacity	375 lbs. (per supplier)
Flow	40,000 gallons/month of backwash
Carbon Use	2,800 gal/lb carbon (per supplier) 40,000 gal/mon / 2,800 gal/lb 14.3 lb/mon
Carbon Life	375 lbs/drum / 14.3 lbs/mon 26.2 months (>3 years @ 8 months operation/year)